UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Case No. 1:22-cy-00125

Plaintiffs,

v.

Hon. Matthew F. Kennelly

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

PLAINTIFFS' MOTION TO SEAL THEIR MOTION TO COMPEL AND FOR SANCTIONS AGAINST GEORGETOWN UNIVERSITY AND ITS COUNSEL AND FOR RELATED RELIEF

Pursuant to the Confidentiality Order in this case (ECF No. 254) and Local Rule 26.2, Plaintiffs respectfully request that the Court grant this Motion to File Under Seal their Memorandum of Law in Support of Their Motion to Compel and for Sanctions against Defendant

Georgetown University ("Georgetown") and its Counsel and for Related Relief and the exhibits cited therein. In support of their Motion, Plaintiffs state as follows:

- 1. The memorandum at issue discusses, references, and appends certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order.
- 2. In accordance with Local Rule 26.2(c), the memorandum at issue will continue to be provisionally under seal, but an unredacted version will be provided to counsel and the Court. In addition, a redacted (public) version will be filed via the ECF system within 14 days.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' motion.

Dated: July 17, 2023

By:/s/Robert D. Gilbert Robert D. Gilbert Elpidio Villarreal Robert S. Raymar Sarah Schuster Steven Magnusson GILBERT LITIGATORS & COUNSELORS, P.C. 11 Broadway, Suite 615 New York, NY 10004 Phone: (646) 448-5269 rgilbert@gilbertlitigators.com pdvillarreal@gilbertlitigators.com rraymar@gilbertlitigators.com sschuster@gilbertlitigators.com amarquez@gilbertlitigators.com smagnusson@gilbertlitigators.com Respectfully Submitted,

/s/ Edward J. Normand

Devin "Vel" Freedman
Edward J. Normand
Peter Bach-y-Rita
FREEDMAN NORMAND
FRIEDLAND LLP
99 Park Avenue
Suite 1910
New York, NY 10016
Tel: 646-970-7513
vel@fnf.law
tnormand@fnf.law
pbachyrita@fnf.law

Eric L. Cramer Caitlin G. Coslett Ellen Noteware BERGER MONTAGUE PC 1818 Market Street, Suite 3600 Philadelphia, PA 19103 Tel: 215-875-3000 Daniel J. Walker Robert E. Litan Hope Brinn BERGER MONTAGUE PC 2001 Pennsylvania Avenue, NW Suite 300 Washington, DC 20006 ecramer@bm.net ccoslett@bm.net enoteware@bm.net Richard Schwartz BERGER MONTAGUE PC 1720 W Division Chicago, IL 60622 Tel: 773-257-0255 rschwartz@bm.net Tel: 202-559-9745 rlitan@bm.net dwalker@bm.net hbrinn@bm.net